



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

August 20, 2014

By ECF

Hon. John G. Koeltl
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Jordan B. Leader
Senior Counsel
d 212.969.3922
f 212.969.2900
jleader@proskauer.com
www.proskauer.com

Re: *Scantibodies Laboratory, Inc. v. Church & Dwight Co., Inc.* 14 Civ. 2275 (JGK)

Dear Judge Koeltl:

We represent defendant Church & Dwight Co., Inc. ("Church & Dwight") in the above-referenced action.

As Your Honor may recall, on August 12 Plaintiff filed a letter (D.I. 37) seeking an informal discovery conference to resolve issues with requests it had made to Church & Dwight. The next day, Church & Dwight filed a short letter (D.I. 38) explaining that Plaintiff's letter was premature because the meet and confer process was ongoing and, accordingly, we suggested that, rather than each party raise their respective discovery issues with the Court piecemeal, it would be more efficient for the Court to address all of the discovery issues raised by both sides at one conference. The Court thereafter scheduled a discovery conference for September 4, 2014.

We had expected that the meet and confer process would have concluded by the end of last week, so we requested permission to submit our response to SLI's letter today, along with any outstanding concerns that Church & Dwight has with respect to SLI's objections to Church & Dwight's document requests. The parties have since been engaged in further meet and confer sessions and there has been a narrowing of the issues. However, because the parties are still engaged in that effort, and we are hopeful that we can further narrow the areas of disagreement, we request the Court's permission to submit our complete letter when the meet and confer sessions end, which should be next week, well in advance of the September 4 discovery conference. Of course, if the Court prefers that we submit a substantive letter concerning outstanding areas of disagreement sooner, we will do so.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jordan B. Leader".

Jordan B. Leader

cc: counsel of record by ECF